

# Complaints Procedure

## Scope

This procedure is operated by the firm in relation to its financial services provided under the Consumer Protection Code 2025.

## Our objectives:

- To respond to complaints in a courteous, timely and fair manner.
- To take all reasonable steps to resolve any complaint with the consumer making the complaint.
- To endeavour to address the specific issues raised by our customers and, where appropriate, update our procedures to avoid re-occurrence of problems.
- To endeavour to achieve a situation where our customer feels we have addressed the complaint, but if he/she remains dissatisfied with the outcome of our efforts, to ensure that he/she is notified of the right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO).

## Procedure

- (1) The firm will establish and maintain a complaints file and all complaint records will be kept for six years.
- (2) Where the firm receives an oral complaint, we will offer the consumer the opportunity to have the complaint handled in accordance with the firms' complaints process. The firm will investigate the complaint on the basis of our understanding of the issue.
- (3) The firm shall permit and facilitate submission of complaints in writing by post and by electronic means.
- (4) The firm will implement and maintain systems and controls to effectively track and manage the progress and resolution of complaints.
- (5) The firm will acknowledge in writing each complaint within 5 working days of receipt. This acknowledgement will contain a copy of these procedures and notification that the complainant can refer the matter to the Financial Services and Pensions Ombudsman (FSPO) if he/she is not happy with the outcome of our investigation, or if the matter has not been resolved within 40 business days, the anticipated timeframe within which the firm hopes to resolve the complaint. Contact details of the Financial Services and Pensions Ombudsman (FSPO) will also be provided.
- (6) The firm shall provide the consumer making the complaint, or the person making the complaint on the consumer's behalf, with a point or points of contact in relation to the complaint until the complaint is resolved or all steps of the firm's complaints handling procedures have been exhausted.
- (7) We shall investigate the complaint as swiftly as possible and shall provide the consumer making the complaint with a regular update, on paper or on another durable medium, on the progress of the investigation of the complaint at intervals no greater than 20 working days, starting from the date on which the complaint was received.
- (8) The firm will attempt to investigate and resolve the complaint within 40 working days of having received the complaint; where the 40 working days has elapsed and the complaint is not resolved, the complainant will be informed of the anticipated timeframe within which the firm hopes to resolve the complaint and that the complainant can refer the matter to the Ombudsman and the contact details of such Ombudsman will be provided.
- (9) Within 5 working days of the conclusion of our investigation of the complaint, the firm shall advise

the consumer making the complaint on paper or on another durable medium of:

- (a) The decision at the conclusion of the investigation, including the reasons for that decision,
  - (b) Where applicable, the terms of any offer or settlement being made to the consumer making the complaint,
  - (c) Where the consumer has a right to refer the matter to a relevant ombudsman, the fact that the consumer may refer the matter to the Financial Services and Pensions Ombudsman (FSPO), and
  - (d) The contact details of the Financial Services and Pensions Ombudsman (FSPO).
- (10) Where it appears to the firm that the complainant is not satisfied with the outcome of our investigation, and where we feel that we cannot progress the issue further, we will immediately write to the complainant advising them of their right to refer the dispute to the Financial Services and Pensions Ombudsman (FSPO).
- (11) A senior manager will review the file before its conclusion and attempt to identify any procedures that can be implemented by our firm to avoid a repeat of the type of complaint received. Any new procedures will be immediately communicated to all staff and placed in the Written Procedures file.

The person responsible for complaints in this firm is: John O'Connell.

There is a Complaints Register where details of complaints are recorded.